

DECLARATION OF WESTON C. ROWLAND

I, Weston C. Rowland, declare as follows:

1. I have personal knowledge of the facts stated below and could testify competently to these facts if I were asked to testify as a witness.

2. I am an attorney in the Law Offices of Carol A. Sobel. I was assigned to the day-to-day administration of the class settlement. I set up an email account - cooleysettlement@gmail.com - and telephone number 1-520-245-3754 where information about the proposed class action settlement could be obtained.

3. Our law office coordinates monthly pro bono clinics in Venice for current and formerly homeless individuals who receive citations for violating “quality-of-life” laws. Through the clinics, we maintained contact with approximately two dozen individuals whose property was seized in the Cooley incident. We were able to do direct contacts with many of these people based on current information we had for them.

4. Because a significant number of the putative class members are unhoused, the bulk of the notice outreach was done by posting signs in and around the area where the injuries arose in 2017 and by personal contacts. The signs posted contained the Notice information previously approved by the Court.

5. I also met with local advocates for homeless persons and asked them to provide a list of those individuals they remember being present on the day of the event that gave rise to the claims in Cooley v. City of Los Angeles. This list supplemented a list of approximately two dozen individuals made in 2017 shortly after the incident. The list was prepared with the assistance of advocates.

6. For everyone who provided us an email earlier, we sent electronic notice of the pending settlement. We also posted notice of the settlement on social media and solicited current contact information from other individuals in the community as to the last known contact for some class members. We also

1 provided Notice of the settlement and potential class members to case workers at
2 various service providers in the area and at locations where unhoused persons
3 receive services.

4 7. In total 53 claim forms were timely submitted. In addition, one claim
5 form was received on October 31, 2020, for a total of 54 claim forms that were
6 validated for class members. One additional claim form was received; however,
7 based on the list of individuals compiled at the time and with the assistance of
8 advocates, the additional claim for was not of someone present at the time.

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10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed November 2, 2020, in Los Angeles, California.

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